

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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ERIE INSURANCE COMPANY a/s/o CHAIM  
GELBMAN and DROR L'CHOL YOSHVEHO LLC,

Plaintiff,

CIVIL CASE NO.

vs.

NOTICE OF REMOVAL  
(Jury Trial Demanded)  
Rockland County  
State Court  
Index No.: 032022/16

BROAN-NUTONE, LLC,

Defendant.

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Defendant Broan-Nutone, LLC ("Broan-Nutone"), by its attorneys, Lynch Rowin LLP, hereby gives notice of the removal of this action from the Supreme Court of the State of New York, County of Rockland, to the United States District Court for the Southern District of New York and alleges as follows:

1. Plaintiff Erie Insurance Company is a Pennsylvania corporation with its principal place of business at 100 Erie Insurance Place, Erie, PA 16530.
2. Broan-Nutone is a Delaware corporation with its principal place of business at 926 W. State Street, Hartford, WI 53027. Broan-Nutone was served with the summons and complaint (annexed hereto as Exhibit A) on June 20, 2016.
3. Nortec, Inc., is the sole member/owner of Broan-Nutone. Nortec, Inc. is a Delaware corporation with its principal place of business at 50 Kennedy Plaza,

Providence, Rhode Island 02903.

4. This Court has jurisdiction over this action pursuant to 28 U.S.C. § 1332 (a)(1), and Local Civil Rule 81.1, in that there is diversity of citizenship and plaintiff is claiming damages in excess of \$75,000, exclusive of interests and costs.

5. This action may be removed pursuant to 28 U.S.C. § 1441(b), in that this Court has original jurisdiction of this action and no defendant or plaintiff is a citizen of New York.

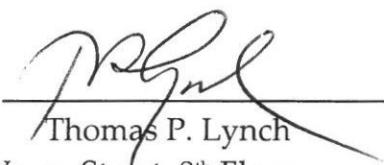
6. The date of this notice is within 30 days of the date of plaintiff's service of the summons and complaint.

Dated: New York, New York

June 28, 2016

LYNCH ROWIN LLP  
*Attorneys for Broan-Nutone LLC*

By:

  
Thomas P. Lynch  
30 Vesey Street, 8<sup>th</sup> Floor  
New York, New York 10007  
Telephone: (212) 682-4001  
Facsimile: (646)688-3616  
tlynch@lynchrowin.com

TO: SHEPS LAW GROUP  
25 High Street  
Huntington, New York 11743  
(631)249-5600  
Attorneys for Plaintiff